

Exhibit 2

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May 24, 2022

**NOTICE OF LITIGATION
DEMAND TO CEASE AND DESIST
DEMAND TO PRESERVE DOCUMENTS**

VIA EMAIL To: info@goldenboypromotions.com; marylyn@goldenboyllc.com;
eric@goldenboypromotions.com
FIRST-CLASS MAIL

Eric Gomez
President
Golden Boy Promotions, Inc.
626 Wilshire Blvd Ste 350
Los Angeles, CA, 90017-3581

Re: Charming Beats LLC. adv. Golden Boy Promotions, Inc. ("GOLDEN")

Mr. Gomez:

I represent Charming Beats LLC the sole owner of the copyrighted recording and composition titled "DEA" – U.S. Copyright Registration No. SR 712-226 (the "Copyrighted Track"). GOLDEN, without license or authority, copied and synchronized the Copyrighted Track to an infringing advertisement titled "Joseph Diaz Jr Training Camp - July 30 HBO Latino" (the "Infringing advertisement"). GOLDEN also distributed copies of the Infringing advertisement to YouTube where it was, and is, publicly displayed on GOLDEN's YouTube page located at <<https://www.youtube.com/watch?v=gW6jp-BJSNo>>.

At no time did GOLDEN have a license to synchronize, distribute, or publicly display the Copyrighted Track. GOLDEN was informed of the fact that there was no license by email from my client dated September 15, 2021; GOLDEN failed to respond.

GOLDEN has infringed my client's exclusive rights to the Copyrighted Track as set forth in Section 106 of the U.S. Copyright Act. Provided someone contacts me at rgarbarini@garbarinilaw.com or at 212.300.5358, no later than 3:00 pm on May 27, 2022, I will

refrain from filing an action at this time. In the event GOLDEN fails to contact me, I will have no choice but to file against GOLDEN in the Federal Court for the Eastern District of New York. In the interim, GOLDEN is required to preserve all documents including web pages, in their original condition, or face a possible spoliation charge at the trial of this action.

GARBARINI FITZGERALD P.C.

By: Richard M. Garbarini
Richard M. Garbarini